

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

In re: Rule 45 Subpoena to Tellabs, Inc.

Case No. 10-6306

**TELLABS, INC.'S AND CHEETAH OMNI, LLC'S JOINT MOTION FOR
ENTRY OF A MODIFIED PROTECTIVE ORDER**

Cheetah initiated litigation against Verizon Services Corp., et al., in the United States District Court for the Eastern District of Texas, Case No. 6:09-cv-260-LED. On July 16, 2010, Cheetah served a Subpoena *Duces Tecum* on Tellabs. On October 7, 2010, this Court entered a Protective Order to govern use of information obtained pursuant to the Subpoena. Cheetah subsequently appealed the Protective Order to the United States Court of Appeals of the Federal Circuit. The parties have agreed to the dismissal of that appeal and to the entry of a Modified Protective Order Governing Exchange Of Information Deemed Confidential.

Accordingly, the Parties respectfully request that the Court enter the contemporaneously filed Modified Protective Order Governing Exchange Of Information Deemed Confidential, attached as Exhibit 1.

Date: March 22, 2011

Respectfully submitted,

/s/ Thomas A. Lewry

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